

Approved: Justin V. Rodriguez **12 MAG 7249**
JUSTIN V. RODRIGUEZ
Assistant United States Attorney

Before: THE HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York

- - - - - X
UNITED STATES OF AMERICA : SEALED COMPLAINT
:
- v. - : Violation of
: 18 U.S.C. § 1951
:
ALLANMON MAVUMKAL, : COUNTY OF OFFENSE:
: BRONX
Defendant. :
:
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEVEN M. SAINT HILAIRE, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

COUNT ONE

1. On or about September 21, 2017, in the Southern District of New York and elsewhere, ALLANMON MAVUMKAL, the defendant, did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, MAVUMKAL robbed at knifepoint a livery cab driver in the Bronx.

(Title 18, United States Code, Section 1951.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

2. I am a Detective with the NYPD and a member of the NYPD/Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") Joint Robbery Task Force. I have been involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law

enforcement agents, and my examination of various reports, records, video footage, and pictures. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview of the Livery Cab Robberies Pattern

3. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned, in substance and in part, the following:

a. The NYPD/ATF Joint Robbery Task Force, along with other law enforcement agencies, has been investigating a pattern of approximately ten livery cab robberies that have occurred in the Bronx, Yonkers, and Mt. Vernon over the past approximately two weeks. In each robbery that is part of the pattern, the perpetrator hails a livery cab, the perpetrator tells the driver to drive to a specific location, and then, once the cab is near the location, the perpetrator displays a large knife and demands that the driver exit the cab. The perpetrator then takes the cab and other property and drives away.

b. As discussed further below, law enforcement has developed probable cause to believe that ALLANMON MAVUMKAL, the defendant, is the perpetrator of the approximately ten robberies in the pattern described above.

c. The robbery that is the basis of Count One of this Complaint is one of the robberies in the pattern described above.

The September 21, 2017 Livery Cab Robbery

4. Based on my conversations with other law enforcement officers, my review of law enforcement reports, including reports of statements to law enforcement made by an individual who drives a livery cab ("Victim-1"), and my review of video footage, I have learned, in substance and in part, the following:

a. As part of Victim-1's work as a livery cab driver, Victim-1 transports paying customers from points in the state of New York to points outside of the state of New York on a regular basis.

b. On or about September 21, 2017, Victim-1 was driving his livery cab in the Bronx. Victim-1 picked up a passenger (the "Robber") near Fordham Road and Webster Avenue and, at the Robber's direction, drove to East 241st and Bullard Avenue in the Bronx. At that point, the Robber displayed a knife and ordered Victim-1 out of the cab. After Victim-1 exited the cab, the Robber then drove away in the cab.

c. Victim-1's livery cab is equipped with a video camera that faces towards the rear passenger seat of the cab. The camera recorded the Robber's trip on or about September 21, 2017, in Victim-1's cab, which was later recovered by law enforcement. Video footage of that trip shows the Robber displaying a large knife, becoming very agitated, and reaching over to the driver's seat with the knife (the "Video Footage").

d. On or about September 26, 2017, the Video Footage and still images from the Video Footage was provided by law enforcement to various media outlets.

e. On or about September 27, 2017, the NYPD received a call from a caller ("Caller-1") on one of its public tip hotlines. Caller-1 stated, in substance and in part, that Caller-1 had seen images of the Robber on the news, and provided the Robber's first name as "Allen" as well as "Allen's" former place of employment, which allowed law enforcement to determine, along with additional information, that Caller-1 had identified ALLANMON MAVUMKAL, the defendant, as the person Caller-1 recognized as the Robber.

f. On or about September 27, 2017, law enforcement prepared a photograph array containing multiple photographs, including one of MAVUMKAL, and showed the array to Victim-1, who identified the photograph of MAVUMKAL as the Robber.

5. Based on my review of the Video Footage, as well as my review of a picture of ALLANMON MAVUMKAL, the defendant, from a law enforcement database, the Robber depicted in the Video Footage appears to be MAVUMKAL.

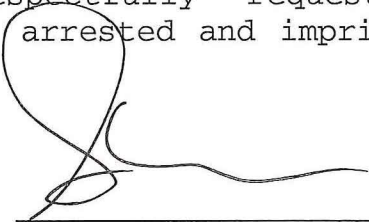
Other Livery Cab Robberies in the Pattern

6. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned, in substance and in part, the following:

a. Approximately ten livery cab robberies—one of which is the robbery of Victim-1's livery cab on or about September 21, 2017, described above—that have occurred in the Bronx, Yonkers, and Mt. Vernon over the past approximately two weeks fit the pattern described in Paragraph 3(a), based on information provided about those robberies from victims.

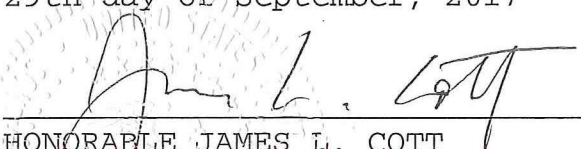
b. In addition to Victim-1, since on or about September 27, 2017, three other victims of the pattern robberies described above have been shown photograph arrays by law enforcement containing multiple photographs, including one of ALLANMON MAVUMKAL, the defendant. Each of those three other victims have identified the photograph of MAVUMKAL as the robber.

WHEREFORE, I respectfully request that ALLANMON MAVUMKAL, the defendant, be arrested and imprisoned, or bailed, as the case may be.



STEVEN M. SAINT HILAIRE
Detective
New York City Police Department

Sworn to before me this
29th day of September, 2017



HONORABLE JAMES L. COTT
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK